

**IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF TENNESSEE  
AT NASHVILLE**

**BRAD AMOS,**

**Plaintiff,**

**vs.**

**THE LAMPO GROUP, LLC and DAVE  
RAMSEY,**

**Defendant.**

**Case No: 3:21-cv-00923**

**Judge Richardson/Holmes**

**Jury Demand**

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**MOTION SETTING SUPPLEMENTAL DISCOVERY DEADLINES AND FOR  
EXTENSION OF DISCOVERY**

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Come now the Plaintiff, by and through counsel, and hereby moves to set the following deadlines pursuant to the Court's January 24, 2023 Order (Doc. 67).

**PRELIMINARY STATEMENT**

Defendant stated in the discovery conference held January 24, 2023 in this matter that no documents were being withheld for privilege (Doc 67, Par. 1); but now Defendants claim they need to check to see if there are any additional documents given the temporal limit for discovery requests set by the court. (Doc 67, Par 7). Defendants claim they need to check to see if there are any privileged documents in any new documents responsive to Plaintiff's requests given the court's order on temporal limits.

Plaintiff in good faith sought to allow Defendants until February 15<sup>th</sup> to provide these documents and an accompanying privilege log for any documents that were withheld.

Defendants however seek to hide documents even after being ordered to turn them over. Their false outrage is just masked frustration at being required to comply with the orders of the Court and

Defendants' own statements. Plaintiff can file all correspondence between the parties regarding this Joint Motion, not partial, should the court request it.

The motion below is the exact same language the parties agreed to with the exception of Paragraph f.

Defendants stated the following is the only language they would accept in Paragraph f:

***“Defendants will provide an accompanying privilege log if necessary by February 15, 2023.”***

This language is vague and pointless unless it states to what documents the privilege log would apply. Plaintiff proposed the following language:

***“Defendants will provide complete responses to any discovery submitted by Plaintiff in this matter which have not already been provided by February 15, 2023 using the temporal limit set by the court in Paragraph 7 of the order. An accompanying privilege log will be provided if necessary pursuant to Paragraph 2 of the order.”***

Defendants flatly refused this language.

Should the Defendants need a brief amount of time past February 15 to comply with this part of the order; Plaintiff will not object. However, Plaintiff insists Defendants fully comply with the order itself. (Doc 67)

#### **The Previously Agreed on Motion Language with the exception of Paragraph f**

The parties request the following deadlines for compliance with said order (Doc. 67):

- a. Defendants shall comply with paragraph 1 of the order by February 2, 2023.
- b. Defendants shall comply with paragraph 3 of the order by February 2, 2023.
- c. Defendants shall comply with paragraph 4 of the order by February 2, 2023.
- d. Defendants shall comply with paragraph 5 of the order by February 15, 2023.
- e. Defendants shall comply with paragraph 6 of the order by February 15, 2023. This information will be produced in PDF format with Bates numbers on each page.

Defendants will also produce the documents in their native format.

f. (TO BE DETERMINED BY COURT)

Pursuant to the court order, the parties request the following deadlines be amended in the case management order:

1. The parties shall complete all discovery by May 15, 2023
2. Any dispositive motion shall be filed by June 2, 2023 with responses due 21 days

later. Optional replies shall be due 7 days after.

Respectfully Submitted,

**THE EMPLOYMENT & CONSUMER LAW GROUP**

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*Attorney for Plaintiff*

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true and correct copy of the above and foregoing was served electronically via the Court's CM/ECF filing system this 31 day of January, 2023 to the following:

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